

1 William D. Marler (WSBA 17233)

2 **MARLER CLARK, INC., P.S.**

3 1012 First Avenue, 5th Floor

4 Seattle, WA 98104

5 Tel : 206-346-1888

6 bmarler@marlerclark.com

7 *Attorneys for Legal Scholars as Amici Curiae*

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF WASHINGTON**

10 NATIONAL SHOOTING)

11 SPORTS FOUNDATION, INC.,)

12 Plaintiff,)

13 v.)

14 ROBERT W. FERGUSON,)

15 Attorney General of the State of)

16 Washington,)

17 Defendant.)

NO. 2:23-cv-00113-MKD

MOTION FOR LEAVE
TO APPEAR PRO HAC VICE
FOR TIMOTHY M. HAGGERTY

06/07/2023

Without Oral Argument

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20 I, William Dale Marler, counsel of record for *Amici Curiae* Legal Scholars,
21 respectfully move the Court for an Order granting admission pro hac vice to
22 attorney Timothy M. Haggerty to appear in the above-captioned matter as counsel
23 for *Amici Curiae* Legal Scholars pursuant to Local Rule 83.2(c). I am a licensed
24 member in good standing of the State of Washington bar (WSBA No. 17233) and
25 this Court.
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Timothy M. Haggerty's qualifications for pro hac admission and other information required by Local Rule 83.2 (c)(3) are set forth below.

A. Applicant's address and phone number:

Timothy M. Haggerty
Friedman Kaplan Seiler Adelman & Robbins LLP
1 Gateway Center
Newark, NJ 07102-5311
(973) 877-6400

B. Dates of admission to practice before other courts:

Court	Admission Date
New Jersey State Bar	12/11/2005
New York Supreme Court, Appellate Division, Third Department	04/13/2006
U.S. Court of Appeals for the Third Circuit	10/24/2018
U.S. District Court for the Eastern District of New York	04/16/2021
U.S. District Court for the Southern District of New York	03/21/2012
U.S. District Court for the District of New Jersey	01/03/2006

C. Name, address, and phone number of admitted counsel with whom the applicant is associated.

William Dale Marler
MARLER CLARK, INC., P.S.
1012 First Avenue, 5th Floor
Seattle, WA 98104
Tel : 206-346-1888

D. The necessity for appearance by the applicant.

Given his experience and the focus of his practice, Timothy M. Haggerty's

1 participation in this action would benefit *Amici Curiae* Legal Scholars and would
2 assist in ensuring a fair and efficient resolution of this matter. In addition, Mr.
3 Haggerty also represents the Legal Scholars as *amici curiae* in the appellate
4 proceeding currently pending before the Third Circuit Court of Appeals (*NSSF v.*
5 *Matthew Platkin, Attorney General of New Jersey*, No. 22-cv-6646 (D.N.J. filed
6 2022), on appeal at No. 23-1214 (3d Cir.)).
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9 E. Whether the applicant has any pending disciplinary sanction actions
10 or has ever been subject to disciplinary sanctions by any court or bar association.
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12 Mr. Haggerty does not have any pending disciplinary sanctions against him,
13 nor has he ever been subject to any disciplinary sanctions by any court or bar
14 admission.
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1 WHEREFORE, we respectfully request that the Court admit Timothy M.
2 Haggerty to appear pro hac vice in this action as counsel for *Amici Curiae* Legal
3 Scholars.
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5 DATED this 7th day of June, 2023.
6

7 **MARLER CLARK, INC., PS**
8

9 By: /s/ William D. Marler
10 William D. Marler, Esq.
11 1012 1st Avenue, Fifth Floor
12 Seattle, Washington 98104
13 Telephone: (206) 346-1888
bmarler@marlerclark.com

14 **FRIEDMAN KAPLAN SEILER**
15 **ADELMAN & ROBBINS LLP**

16 Timothy M. Haggerty
17 (*pro hac vice forthcoming*)
18 Rupita Chakraborty
19 (*pro hac vice forthcoming*)
20 Alexandra Elenowitz Hess
21 (*pro hac vice forthcoming*)
7 Times Square
New York, NY 10036-6516
(212) 833-1100

22 *Attorneys for Amici Curiae Legal Scholars*
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CERTIFICATE OF SERVICE

On the 7th day of June, 2023, I caused to be served, via ECF electronic service, a true copy of the foregoing Motion for Leave to Appear Pro Hac Vice for Timothy M. Haggerty upon all counsel registered for e-service.

DATED this 7th day of June, 2023

s/ William D. Marler

William D. Marler

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